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Counsel for Individual and Representative Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

J. DOE 1 et al.,
Individual and Representative Plaintiffs,
v.
GITHUB, INC., et al.,
Defendants.

Case Nos. 4:22-cv-06823-JST
4:22-cv-07074-JST

**DECLARATION OF JOSEPH R. SAVERI
IN SUPPORT OF PLAINTIFFS'
MOTION FOR ENTRY OF
PROTECTIVE ORDER FOR
LITIGATION INVOLVING PATENTS,
HIGHLY SENSITIVE CONFIDENTIAL
INFORMATION AND/OR TRADE
SECRETS (FRCP 26(c)(1)(G), L.R. 7-1)**

Judge: Hon. Jon Tigar
Date: March 16, 2023
Time: 2:00 p.m.
Courtroom: 6, 2nd Floor

1 I, Joseph R. Saveri, declare as follows:

2 1. I am an attorney duly licensed to practice in the State of California. I am a partner
3 and founder of the Joseph Saveri Law Firm, LLP (“JSLF”), counsel of record for Plaintiffs Does
4 1–4 in this action. I have personal knowledge of the matters stated herein and, if called upon, I
5 could competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 in
6 support of Plaintiffs’ Motion for Entry of a Protective Order for Litigation Involving Patents,
7 Highly Sensitive Confidential Information and/or Trade Secrets (FRCP 26(c)(1)(G), L.R. 7-1).

8 2. Attached hereto as **Exhibit A** is a true and correct copy of an email message that
9 was sent by my firm to counsel for Defendants in this case, Annette Hurst and Joseph Gratz on
10 December 13, 2022.

11 3. Attached hereto as **Exhibit B** is a true and correct copy of an email message that
12 was sent by my firm to counsel for Defendants in this case, Annette Hurst and Joseph Gratz on
13 December 14, 2022.

14 4. Attached hereto as **Exhibit C** is a true and correct copy of an email message that
15 was sent by my firm to counsel for Defendants in this case, Annette Hurst and Joseph Gratz on
16 January 20, 2023.

17 5. Plaintiffs have not received any responses to Exhibits A–C as of the date of this
18 filing.

19 6. The Court has set the Initial Case Management Conference (“CMC”) for March
20 14, 2023. Per Rule 26(f), the parties must confer on certain issues no later than 21 days before
21 the CMC, i.e., February 21, 2023. Per Rule 26(a)(1)(C), Initial Disclosures must be made within
22 fourteen days of the CMC, i.e., March 7, 2023. The last date for Initial Disclosures is March 7,
23 2023.

24 7. Plaintiffs’ [Proposed] Protective Order for Litigation Involving Patents, Highly
25 Sensitive Confidential Information and/or Trade Secrets, filed concurrently with this motion, is

1 identical to the Court's model protective order of the same title, except for the addition of case-
2 identifying information and the elimination of certain language denoted as optional.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed this 23rd day of January, 2023 at San Francisco, California.

5 _____
6 *Joseph R. Saveri*
Joseph R. Saveri

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